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6 THE CHILDREN'S PLACE RETAIL STORES, INC.

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION
11

12 GALINA SEEBROOK, individually and on
behalf of all others similarly situated,

13 Plaintiffs,

14 v.
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16 THE CHILDREN'S PLACE RETAIL
STORES, INC., a Delaware corporation,

17 Defendant.
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Case No. 11-cv-00837-CW

CLASS ACTION

**STIPULATION AND [~~PROPOSED~~] ORDER
RELATING CASES**

Pursuant to Local Civil Rules 3-12, 7-11, and 7-12, counsel for plaintiff Galina Seebrook in *Seebrook v. The Children's Place Retail Stores, Inc.*, Case No. 11-cv-00837-CW ("Seebrook"), counsel for plaintiff Maria Isabel Beltran in *The Children's Place Retail Stores, Inc., et al.*, Case No. 11-cv-01664-CRB ("*Beltran*"), and counsel for defendant The Children's Place Retail Stores, Inc. ("Children's Place") jointly submit the following Stipulation that the above-captioned action, *Seebrook*, is related to the *Beltran* action.

RECITALS

WHEREAS, on February 28, 2011, plaintiff Galina Seebrook filed this putative class action lawsuit against defendant Children's Place in this Court;

WHEREAS, on March 9, 2011, plaintiff Maria Isabel Beltran filed the above-referenced putative class action lawsuit against defendant Children's Place in the Superior Court for the State of California, County of San Francisco;

WHEREAS, on April 6, 2011, Children's Place removed the *Beltran* action from the Superior Court for the State of California, County of San Francisco, to the United States District Court for the Northern District of California;

WHEREAS, on April 12, 2011, Children's Place filed an Administrative Motion to Consider Whether these Actions Should Be Related; and

WHEREAS, plaintiffs' counsel and Children's Place's counsel agree that the *Seebrook* and *Beltran* actions should be deemed "related" under Local Civil Rule 3-12.

STIPULATION

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto through their respective counsel of record, that the *Seebrook* and *Beltran* actions are related within the meaning of Civil Local Rule 3-12.

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1 **IT IS SO STIPULATED.**

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3 Dated: April 13, 2011

COOLEY LLP
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MAZDA K. ANTIA (214963)
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6 */s/ Jennifer M. French*
7 Jennifer M. French

8 Attorneys for Defendant
9 THE CHILDREN'S PLACE RETAIL STORES, INC.

10
11 Dated: April 13, 2011

HOFFMAN & LAZEAR
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15 */s/ Chad A. Saunders*
16 Chad A. Saunders

17 Attorneys for Plaintiff
18 GALINA SEEBROOK

19 Dated: April 13, 2011

HARRISON PATTERSON & O'CONNOR LLP
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22 */s/ James R. Patterson*
23 James R. Patterson

24 Attorneys for Plaintiff
25 MARIA ISABEL BELTRAN
26
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FILER'S ATTESTATION

Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that all parties have concurred in the filing of this Stipulation Regarding Deadline to Respond to Complaint.

Dated: April 13, 2011

COOLEY LLP
MICHELLE C. DOOLIN (179445)
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/s/ Jennifer M. French
Jennifer M. French


Attorneys for Defendant
THE CHILDREN'S PLACE RETAIL STORES,
INC.

[PROPOSED] ORDER

Based on the foregoing, and good cause appearing, **IT IS HEREBY ORDERED** that the *Seebrook* and *Beltran* actions are related within the meaning of Civil Local Rule 3-12.

IT IS SO ORDERED.

Dated: **4/18/2011**



THE HONORABLE CLAUDIA WILKEN
UNITED STATES DISTRICT JUDGE